

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

JUDITH THIBEAU
and GEORGE THIBEAU,
Plaintiffs,

Docket No. 04-10643MLW

v.

UNITED STATES OF AMERICA
and EAST BOSTON NEIGHBORHOOD
HEALTH CENTER CORPORATION
Defendants

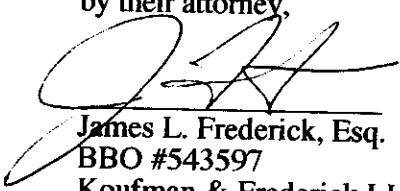
PROPOSED PRETRIAL SCHEDULE AND CERTIFICATION

Pursuant to the Court's Notice of Scheduling Conference the parties state their agreement as to the following pretrial schedule:

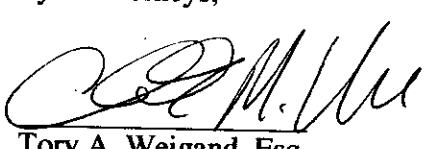
Propound written discovery (initial interrogatories and initial document requests)	12/2 - 2/2/05
Initial responses to written discovery	1/2/05 - 4/2/05
Take depositions	2/1/05 - 7/1/05
Motions to compel	as needed.

Counsel for plaintiffs and each co-defendant further hereby certify that they have conferred with their clients regarding establishing a budget for the costs of conducting the full course of the litigation in this case, as well as the costs of conducting alternative courses of litigation. Counsel also certify that they have conferred with their clients regarding resolution of the case through the use of alternative dispute resolution programs such as those outline in Local Rule 16:4.

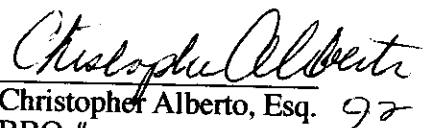
Plaintiffs
Judith and George ThibEAU,
by their attorney,


James L. Frederick, Esq.
BBO #543597
Koufman & Frederick LLP
1330 Beacon Street, Suite 311
Brookline, MA 02446-3202

Defendant
East Boston Neighborhood Health Center
by its attorneys,


Tory A. Weigand, Esq.
BBO# 548553

Defendant,
United States of America
by its attorney,


Christopher Alberto, Esq. 92
BBO #
Office of the United States Attorney
United States Courthouse
1 Courthouse Way
Suite 9200
Boston, MA 00221

Charles Urso, Esq.
BBO # 64778
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210

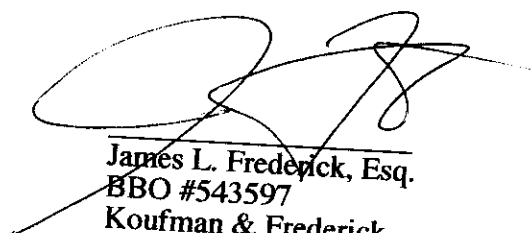
CERTIFICATE OF SERVICE

The undersigned attorney certifies that a Summons and copy of the Plaintiffs' Complaint were served upon the following parties, as required by Federal Rule of Civil Procedure, Rule 4(i), VIA FACSIMILE AND HAND DELIVERY:

Christopher Alberto, Esq.
Assistant U.S. Attorney
United States Attorney for The District of Massachusetts
U.S. Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

Tory A. Weigand, Esq.
BBO# 548553
Charles Urso, Esq.
BBO # 64778
Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210

DATED: 12/2, 2004



James L. Frederick, Esq.
BBO #543597
Koufman & Frederick
1330 Beacon Street, Suite 311
Brookline, MA 02446
(617) 738-7880